

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LISA BULLARD, RICARDO GONZALES,  
CYNTHIA RUSSO, INTERNATIONAL  
BROTHERHOOD OF ELECTRICAL  
WORKERS LOCAL 38 HEALTH AND  
WELFARE FUND, INTERNATIONAL  
UNION OF OPERATING ENGINEERS  
LOCAL 295-295C WELFARE FUND, AND  
STEAMFITTERS FUND LOCAL 439, on  
Behalf of Themselves and All Others Similarly  
Situated,

Plaintiffs,

v.

WALGREEN CO.,

Defendant.

Civil No. 17-cv-2246

Judge Edmond E. Chang  
Magistrate Judge Sheila Finnegan

**JOINT AGREED MOTION FOR AN EXTENSION OF TIME TO SUBMIT  
A JOINT STATUS REPORT, CLASS CERTIFICATION BRIEFING  
AND EXPERT REPORTS**

Plaintiffs Lisa Bullard, Ricardo Gonzales, Cynthia Russo, International Brotherhood of Electrical Workers Local 38 Health and Welfare Fund, International Union of Operating Engineers Local 295-295c Welfare Fund, and Steamfitters Fund Local 439 (collectively, “Plaintiffs”) and Defendant Walgreen Co. (“Walgreens”) (collectively, with Plaintiffs, the “Parties”) jointly move to extend the deadlines for the submission of this month’s Joint Status Report, due today per ECF No. 543, and class certification briefing and expert reports set by Order dated September 9, 2022. ECF No. 539. In support of the Motion, the Parties state as follows:

1. By Order dated September 19, 2022 (ECF No. 543), the Court ordered the parties to file a Joint Status Report by October 20, 2022.

2. By Agreed Order dated September 9, 2022 (ECF No. 539), the Court entered the operative deadlines for the submission of class certification briefing and expert reports.

3. The Parties have been meeting and conferring regarding Plaintiffs' request for 30(b)(6) testimony regarding structured data produced by Walgreens, including Walgreens' April 6, 2022 production and Walgreens' August 23, 2022 production of PSC enrollment and renewal data. On September 16, 2022, Walgreens provided Plaintiffs with a Sixteenth Amended Draft Declaration. As part of the Sixteenth Amended Draft Declaration, Walgreens identified a PSC Database, about which the parties are currently conferring. On September 30, 2022, Plaintiffs provided edits to the Sixteenth Amended Draft Declaration. On October 5, 2022, Walgreens provided additional edits to the Sixteenth Amended Draft Declaration and at the same time requested a meet and confer in an effort to resolve any outstanding issues. The Parties met and conferred on October 13, 2022. Plaintiffs sent Walgreens correspondence regarding the meet and confer on October 18, 2022. Walgreens is reviewing Plaintiffs' requests and anticipates providing its response the week of October 24, 2022.

4. While the Parties are not currently at an impasse as to the issues under discussion, and will timely raise any issues with the Court should the parties agree they are at an impasse, having met and conferred, the Parties believe that good cause exists to extend the deadlines to submit this month's Joint Status Report and the deadlines for expert discovery and class certification briefing so the Parties can continue to meet and confer to determine whether they require the Court's assistance to resolve any outstanding issues.

5. Therefore, for good cause shown, and because Walgreens' 30(b)(6) testimony relating to Walgreens' structured data, including PSC enrollment and renewal data, bears on Plaintiffs' forthcoming motion for class certification, the Parties respectfully request that the Court

order that the deadlines to submit an updated Joint Status Report, class certification briefing and expert reports is modified as follows:

- a) The deadline for the Parties to file an updated Joint Status Report is extended from October 20, 2022 to October 27, 2022.
- b) The deadline for Plaintiffs' expert reports, motion for class certification, and memorandum in support is extended from October 27, 2022 to November 17, 2022.
- c) The deadline for Walgreens to depose Plaintiffs' experts is extended from December 23, 2022 to January 19, 2023.
- d) The deadline for Walgreens' expert reports and its response to the motion for class certification is extended from February 27, 2023 to March 17, 2023.
- e) The deadline for Plaintiffs to depose Walgreens' experts is extended from May 2, 2023 to May 16, 2023.
- f) The deadline for Plaintiffs' rebuttal expert reports and their reply in support of the motion for class certification is extended from June 9, 2023 to June 20, 2023.
- g) As set forth in Judge John Z. Lee's June 16, 2021 Minute Entry (ECF No. 476), if there are *Daubert* motions, the Court will consider them with class certification briefing.

WHEREFORE, the Parties respectfully request that the Court grant the Parties' Joint Agreed Motion for an Extension of Time to Submit A Joint Status Report, Class Certification Briefing and Expert Reports.

DATED: October 20, 2022

s/ Michael Scott Leib

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically through the Court's Electronic Case Filing System, which will then send a notification of such filing to the registered participants as identified on the Notice of Electronic Filing.

Dated: October 20, 2022

*s/ Joseph P. Guglielmo*  
Joseph P. Guglielmo